

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION CORPORATION, Plaintiff-Applicant -v- BERNARD L. MADOFF INVESTMENT SECURITIES LLC, Defendant	Adv. Pro. No. 08-01789 (SMB) SIPA LIQUIDATION (Substantively Consolidated)
In re: BERNARD L. MADOFF, Debtor.	
IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities, LLC Plaintiff, -against- JAMES LOWREY, et al., Defendants.	18 CIVIL 5381 (PAE) Adv. Pro. No. 10-04387 (SMB)
IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities, LLC Plaintiff, -against- SOUTH FERRY BLDG. CO., et al., Defendants.	18 CIVIL 5430 (PAE) Adv. Pro. No. 10-04488 (SMB)
IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities, LLC Plaintiff, -against- SOUTH FERRY #2, LP, et al., Defendants.	18 CIVIL 5452 (PAE) Adv. Pro. No. 10-04350 (SMB)
IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities, LLC Plaintiff, -against- UNITED CONGREGATIONS MESORA, Defendants.	18 CIVIL 5453 (PAE) Adv. Pro. No. 10-04387 (SMB)

JOINT STIPULATION TO FURTHER STAY EXECUTION OF JUDGMENT

The Trustee and the Defendants have agreed that it is appropriate to extend the automatic stay of the time for the Trustee to execute on the judgment and the proceedings to enforce the judgment for a period of an additional 30 days until April 10, 2019.

Recitals:

1. On February 8, 2019, the clerk entered judgment for the plaintiff Trustee in each of the captioned cases in the amounts set forth in the respective judgments against each of the Defendants in these cases. Specifically, the court entered judgments in *Picard v. Lowrey*, No. 18 Civ 5381(PAE) , *Picard v. South Ferry Bldg. Co.*, No. 18 Civ 5430 (PAE), *Picard v. South Ferry #2 LP*, No. 18 Civ 5452 (PAE), and *Picard v United Congregations Mesora*, No. 18 Civ 5453 (PAE).
2. On February 20, 2019, all Defendants filed notices of appeal to the Second Circuit Court of Appeals.
3. On March 11, 2019, the automatic stay of execution of the judgment and proceedings to enforce it imposed by FRCP 62(a) is set to expire, subject to further court order.
4. The parties are in good faith discussions about exploring various alternatives to the posting of a bond or other security pending the outcome of the appeals, and the entry of a final non-appealable judgment in these cases, as provided in FRCP 62(b).
5. No prior request for an extension of the stay of the judgment has been made.
6. Intervenor SIPC does not consent to this extension, but does not object to it.

Agreement:

For the foregoing reasons, the Trustee and Defendants jointly request a 30-day extension of the stay imposed by FRCP 62(a), until April 10, 2019, pending a resolution of their discussions to the satisfaction of the Trustee or, in the alternative, for each of the Defendants to post the bond or other security as permitted by FRCP 62(b).

For the Trustee:

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For Intervenor SIPC

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For the Defendants:

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March 5, 2019

3/6/19
So Ordered:

Paul A. Engle
United States District Judge